

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO: 11-077

V.

✻

SECTION: “L”

DEREK CAMPBELL

✻

VIOLATION: 26 U.S.C. § 7206(2)

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* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved beyond a reasonable doubt, by using credible testimonial evidence and incontrovertible physical evidence the following:

The defendant, **DEREK CAMPBELL**, was the husband of Shondrell Campbell. Shondrell Campbell owned and operated Unlimited Tax Service in the Eastern District of Louisiana. Between January 1, 2004 and April 15, 2005, defendant **DEREK CAMPBELL**, acting on the orders of Shondrell Campbell, in order to willfully aid and assist in, and procure, counsel and advise the preparation and presentation to the Internal Revenue Service, of individual tax returns, forms 1040, which were false as to material matters, did purchase the identifying information, specifically, name, date of birth and social security numbers from two individuals: “ST” and “RS.” This information was then used by Shondrell Campbell to prepare false and fraudulent tax returns for the tax year

2004 and were due on April 15, 2005. “ST” and “RS” sold their identifying information to defendant **DEREK CAMPBELL**, but did not give defendant **DEREK CAMPBELL** or Shondrell Campbell permission to file a tax return on their behalf for the tax year 2004. Nevertheless, Shondrell Campbell (d/b/a Unlimited Tax Service) filed tax returns for tax year 2004 for “ST” and “RS” on January 24, 2005 and January 24, 2005, respectfully. Moreover, “ST” and “RS” would confirm that the false items included on both the returns: wages, business income and dependency exemptions, causing fraudulent refunds in amounts totaling \$5,200, were not provided to defendant **DEREK CAMPBELL** by either “ST” or “RS.” Neither “ST” nor “RS” received any of the refund totaling \$5,200. The criminal activity committed by defendant **DEREK CAMPBELL** occurred within the Eastern District of Louisiana.

All of these matters will be proven by credible testimony and records of the Internal Revenue Service, as well as by Agents of the Internal Revenue Service-Criminal Investigation Division.

CARTER K. D. GUICE, JR.
Assistant U.S. Attorney
Louisiana Bar Roll No. 16771

Date

GEORGE CHANEY
Counsel for Defendant
Louisiana Bar Roll No. _____

Date

DEREK CAMPBELL
Defendant

Date